

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TAKEOFF TECHNOLOGIES, INC., et al.,¹

Debtors.

Chapter 11

Case No. 24-11106 (CTG)

Hearing Date: July 31, 2024, at 11:30 a.m. (ET)
Obj. Deadline: July 17, 2024, at 4:00 p.m. (ET)

**NOTICE OF DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF ASHBY & GEDDES,
P.A. AS DELAWARE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF TAKEOFF TECHNOLOGIES, INC., ET AL., AS OF JUNE 14, 2024**

PLEASE TAKE NOTICE that on July 3, 2024, the Official Committee of Unsecured Creditors (the "Committee") of above-captioned debtor and debtor-in possession (the "Debtors"), filed the *Application for an Order Authorizing the Retention and Employment of Ashby & Geddes, P.A. as Delaware Counsel to the Official Committee of Unsecured Creditors of Takeoff Technologies, Inc., et., al., Effective as of June 14, 2024* (the "Application"), with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Application must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court, and served upon, so as to be received by, the undersigned counsel on or before **July 17, 2024 at 4:00 p.m. (ET)**. Only properly and timely filed responses will be considered.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application is scheduled for **July 31, 2024, at 11:30 a.m. (ET)** before the Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors federal tax identification numbers, as applicable, are: Takeoff Technologies, Inc. (0552); Takeoff Technologies Canada, Inc.; Takeoff Technologies Australia Pty Ltd. (ACN 639 288 958); Takeoff Technologies FZE; Takeoff International Subco India Private Limited; and Takeoff International Subco, LLC. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 203 Crescent Street, Suite 203, Waltham, Massachusetts 02453.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 3, 2024

ASHBY & GEDDES, P.A.

/s/ Ricardo Palacio

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*Proposed Counsel to the Official Committee of
Unsecured Creditors*